### BEFORE THE FEDERAL MARITIME COMMISSION

#### YAKOV KOBEL and VICTOR BERKOVICH

### Complainants

V.

# HAPAG-LLOYD A.G., HAPAG-LLOYD AMERICA, INC., LIMCO LOGISTICS, INC., INTERNATIONAL TLC, INC

### Respondents

Docket No. 10-06

## MOTION OF RESPONDENT INTERNATIONAL TLC FOR ENLARGEMENT OF TIME TO FILE EXCEPTIONS TO REMAND INITIAL DECISION

Respondent International TLC, Inc ("International TLC") hereby move this Court for an enlargement of time, seeking a 60-day extension of time until October 20, 2014 within which to file exceptions to the Remand Initial Decision. No previous extensions for this memorandum of exceptions has been sought or granted.

The grounds for this extension are based on good cause and reasonable grounds pursuant to 46 CFR § 502.102. The grounds for this extension are as follows:

- a. International TLC is seeking to challenge various rulings made over the course of the four years of the extensive record in this case. The record in this case is exceptionally large and being represented *pro se*, International TLC is seeking to properly present and address the issues raised in their memorandum of exceptions.
- b. I, Alena Tokar, am with primary responsibility for the preparation of International TLC's memorandum of exceptions, and am not able to complete the necessary work on this

Respondent's behalf within the relevant time period because of other work-related conflicting

commitments, including carrying on with everyday job demands.

c. I will continue to exercise diligence regarding this request and will file our

memorandum of exceptions by the requested due date.

d. Counsel for Limco Logistics does not oppose this motion for enlargement of time.

Counsel for Complainants stated no position for a 30-day extension, but opposed a 60-day

extension.

International TLC respectfully requests that the Commission grant this motion for

enlargement of time to file exceptions to the Remand Initial Decision until October 20, 2014.

Respectfully submitted,

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Dated: August 14, 2014

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### CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2014 I served copies of the foregoing document via email and Express Mail on the below parties:

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